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REMARKS/ARGUMENTS

APR 13 2007

Pending claims 1-2, 10, 15, 44, 48, 49 and 51 stand rejected under 35 U.S.C. § 102(e) over U.S. Patent No. 6,937,222 (Numao). Applicant respectfully traverses the rejection. As to claim 1, Numao nowhere teaches that a multi-pixel memory display array is formed on a first die and a multi-pixel memory array is formed on a second die. Instead, in Numao all that is taught is that a single display substrate includes both display array and memory array. Accordingly, claim 1 and the claims depending therefrom are patentable over Numao. Independent claim 15 and the claims depending therefrom are similarly patentable, as Numao nowhere teaches constructing a pixel display array on a first die and in a first area of a light modulator and constructing on a second die and in a second area of the light modulator a pixel memory array.

As to claim 10, Numao nowhere teaches a modulator that includes pixel display cells having associated pulse width modulation driver circuits, as recited by amended claim 10. Claim 10 is further patentable as there is no teaching, suggestion or motivation to combine Numao with the cited art, including Mitsuo. In this regard, the Office Action concedes that Numao nowhere teaches a pulse width modulation drive circuit. Office Action, p. 4 Instead, the Office Action purports to rely on Mitsuo for such a teaching. *Id.* However, there is no evidence for one of ordinary skill in the art to combine the relevant teachings of Numao and Mitsuo. That is, all the Office Action contends is that Mitsuo teaches PWM circuitry. This identification of the individual elements of a claim is insufficient to set forth a valid obviousness rejection. *In re Rouffet*, 47 U.S.P.Q.2d 1453, 1457 (Fed. Cir. 1998). Further, there is no reasoning for combining these references. Instead the Office Action appears to have relied upon impermissible hindsight, as there is no teaching, suggestion, motivation or incentive in the prior art to combine these references. *In re Lee*, 61 U.S.P.Q.2d 1430, 1435 (Fed. Cir. 2001). Accordingly, claim 10 and the claims depending therefrom are patentable over the proposed combination.

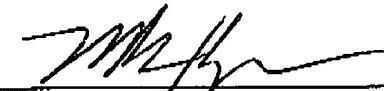
Applicant gratefully acknowledges the indication that dependent claims 24 and 35 include allowable subject matter. Accordingly, independent claims 21 and 34 have been amended to include such subject matter. Thus these independent claims and the claims depending therefrom are patentable.

New dependent claim 54 is patentable for at least the same reasons as the independent claims from which it depends.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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